

### **III. REMARKS**

1. Claims 1-16 are pending. Claims 1-6 and 11 are amended. Claims 17-19 are new.
2. Claims 1, 2, 4-7, 9-12 and 14-19 are patentable under 35 U.S.C. 103(a) over Wu (U.S. Pub. No. 2006/0165465) and Hayes-Pankhurst et al. (U.S. 4,634,818, hereinafter "Hayes"). Claim 1 recites that the bendable elastomeric keymat comprises elastic properties and is configured so that an entirety of the bendable elastomeric keypad bends to force the lips into the plurality of indentations on the cover to attach the edges of the keymat to the cover and the indentations are located at edges of a recess for removably mounting the keymat. Nowhere does the combination of Wu and Hayes disclosed or suggested bending an "entirety" of the "keymat" for "removably mounting the keymat" as recited by Applicant.

While the key module (12) of Wu has flexible side tabs (25) there is clearly no disclosure in Wu that an "entirety" of the key module "bends" to "force the lips into the plurality of indentations on the cover to attach the edges of the keymat to the cover" as recited in Applicant's claim 1. Figure 3 of Wu clearly shows that only the side tabs (25) are flexed for securing the keycap module (12) into the base module (11). All that is disclosed in Wu is that the side tabs (25) are resiliently flexed away from the rim (27) of the base module (11) and immediately return to their normal positions and then snap into the grooves (26) to secure the two modules (11) and (12) to each other (Para. 0076). Wu also discloses a keyboard (800) having a key module (812) that is secured to the base module (811) by tab-like hooks (825) on the key module (812) (See Fig. 12, Para. 0092). All that is disclosed in Wu with respect to the hooks (825) is that the hooks (825) clinch the base module (811) at four corresponding vertical slots (826) formed at the corners of the base module (811) and nothing more. There is absolutely no disclosure in Wu that an "entirety" of the key module (12) or keyboard (800)

"bends" to "force the lips into the plurality of indentations on the cover to attach the edges of the keymat to the cover" as recited in Applicant's claim 1.

Combining Wu with Hayes fails to remedy the above noted deficiency. In Hayes the key mat (15) has an integrally moulded peripheral lip (16). The lip (16) can be engaged with the edges of the circuit board (10) to retain the mat (15) in a predetermined location thereon with the mat (15) in tension both longitudinally and transversely. (Col. 2, L. 46-54). Thus, in Hayes the key mat (15) is not "bent" to "force the lips into the plurality of indentations on the cover to attach the edges of the keymat to the cover" as recited in Applicant's claim 1. Rather the key mat (15) is held on the board (10) by tensioning the key mat (15) and nothing more. This is exactly the opposite of bending the keymat to "force the lips into the plurality of indentations on the cover to attach the edges of the keymat to the cover".

Therefore, the combination of Wu and Hayes cannot disclose or suggest that an "entirety" of the key module "bends" to "force the lips into the plurality of indentations on the cover to attach the edges of the keymat to the cover" as recited in Applicant's claim 1. Therefore, claim 1 is patentable over Wu and Hayes.

Claims 6, 11 and 17 are patentable over Wu for reasons that are substantially similar to those described above with respect to claim 1. Claims 2, 4, 5, 7, 9, 10, 12, 14-16, 18 and 19 are patentable at least by reason of their respective dependencies.

Further, claim 16 recites that the keymat is moulded in one piece. Figures 3 and 8 of Wu do not show the key module (12) as being moulded in one piece. Rather, as described above, the key module (12) in Wu includes at least a frame and a key cap (15) for each and every single key on the key module (12) (See e.g. Fig. 9). Thus, the key module (12) in Wu is made of at least two pieces (i.e. the frame and a key cap for each of the keys). Nowhere does Wu disclose the key module (12) is moulded in one piece. Therefore, claim 16 is patentable for this additional reason.

3. Claims 3, 8 and 13 are patentable under 35 U.S.C. 103(a) over Wu, Hayes and Kfouri et al., U.S. Pub. No. 2003/0119543 ("Kfouri"). Claims 3, 8 and 13 depend from claims 1, 6 and 11 which are patentable over Wu and Hayes for the reasons described above. It is submitted that because the combination of Wu and Hayes does not disclose or suggest all the features of claims 1, 6 and 11, that the combination of Wu Hayes and Kfouri cannot as well. Thus, claims 3, 8 and 13 are patentable at least by reason of their respective dependencies.

Moreover, the combination of Wu, Hayes and Kfouri does not disclose or suggest that the guiding pieces are arranged in direct connection to one or more of said plurality of lips as recited in Applicant's claim 3. The Examiner acknowledges that the combination of Wu and Hayes does not disclose this feature. However, it is asserted in the Office Action that Kfouri discloses this feature in Figures 4 and 5 and at paragraphs [0032]-[0033].

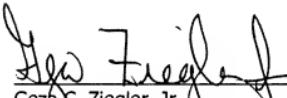
Figures 4 and 5 and at paragraphs [0032]-[0033] of Kfouri disclose exactly the same thing as Wu in that the input module (200) has left and right rails (418, 416) which engage groove (414) when the input module is inserted into the cavity (402). Wu discloses the key module (112) has two opposite side edges (113) for sliding engagement with opposing guide rails (114) formed in an inward rim (115) of the bay (111). When the opposite side edges (113) and opposing guide rails (114) of Wu are compared with the left and right rails (418, 416) and groove (414) of Kfouri it is clear that these features are identical. In both Wu and Kfouri the rails and grooves allow for the input module (200) / key module (112) to be slid into the keycap bay (111) / cavity (402) from a side of the device and nothing more. There is absolutely no disclosure whatsoever that the opposite side edges (113) and opposing guide rails (114) of Wu or the left and right rails (418, 416) and groove (414) of Kfouri "are arranged in direct connection to one or more of said plurality of lips" as recited in Applicant's claim 3.

Therefore, claim 3 is patentable over the combination of Wu, Hayes and Kfouri because their combination does not disclose or suggest that the guiding pieces are arranged in direct connection to one or more of said plurality of lips as recited in Applicant's claim 3. Claims 8 and 13 are patentable over the combination of Wu and Kfouri for reasons that are substantially similar to those described above with respect to claim 3.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,



Geza C. Ziegler, Jr.  
Reg. No. 44,004

14 Jan 2008

Date

Perman & Green, LLP  
425 Post Road  
Fairfield, CT 06824  
(203) 259-1800  
Customer No.: 2512

**CERTIFICATE OF ELECTRONIC FILING**

I hereby certify that this correspondence is being transmitted electronically on the date indicated below and addressed to Mail Stop Amendment, Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

Date: 14 January 2008

Signature: James J. Show

Frances L. Show  
Person Making Deposit